

Christopher R. Pitoun (SBN 290235)
HAGENS BERMAN SOBOL SHAPIRO LLP
301 N. Lake Avenue, Suite 920
Pasadena, California 91101
Telephone: (213) 330-7150
Facsimile: (213) 330-7152
Email: christopherp@hbsslaw.com

Robert B. Carey (*pro hac vice*)
Leonard Aragon (*pro hac vice*)
Michella A. Kras (*pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
11 West Jefferson, Suite 1000
Phoenix, Arizona 85003
Telephone: (602) 840-5900
Facsimile: (602) 840-3012
Email: rob@hbsslaw.com
leonarda@hbsslaw.com
michellak@hbsslaw.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

N.Z., R.M., B.L., S.M., and A.L.,
individually and on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

FENIX INTERNATIONAL LIMITED,
FENIX INTERNET LLC, BOSS
BADDIES LLC, MOXY
MANAGEMENT, UNRULY AGENCY
LLC (also d/b/a DYSRPT AGENCY),
BEHAVE AGENCY LLC, A.S.H.
AGENCY, CONTENT X, INC., VERGE
AGENCY, INC., AND ELITE
CREATORS LLC,

Defendants.

Case No. 8:24-cv-01655-FWS-SSC

**STIPULATION REQUESTING
CONTINUANCE OF HEARING
DATE**

Current Date: January 30, 2025, at
10:00 a.m.

Proposed Date: February 6, 2025, at
10:00 a.m.

Hon. Fred W. Slaughter

1 Plaintiffs N.Z., R.M., B.L., S.M., and A.L. (collectively, “Plaintiffs”), and
2 Defendants Fenix International Limited and Fenix Internet LLC (collectively, the
3 “Fenix Defendants,” and collectively with Plaintiffs, the “Parties”) hereby stipulate
4 and agree as follows:

5 WHEREAS, the Fenix Defendants filed a Motion to Dismiss for Forum Non
6 Conveniens, and Motion to Compel Plaintiffs to Proceed in Their Real Names
7 (collectively “Defendants’ Motions”) on October 25, 2024 (ECF Nos. 60–61);

8 WHEREAS, Plaintiffs filed Oppositions to Defendants’ Motions on
9 November 27, 2024 (ECF Nos. 84–85);

10 WHEREAS, Defendants filed Replies in Support of Defendants’ Motions on
11 December 27, 2024 (ECF Nos. 95–96);

12 WHEREAS, the Court, by stipulation, scheduled the oral argument on
13 Defendants’ Motions to be heard on January 30, 2025 at 10:00 a.m. (ECF No. 71)
14 (Declaration of Robert B. Carey (“Carey Decl.”) ¶ 3);

15 WHEREAS, the Court scheduled a Rule 26(f) Scheduling Conference in this
16 matter to be held on February 6, 2025, at 9:00 a.m., in Courtroom 10D (ECF No.
17 69);

18 WHEREAS, the attorney for Plaintiffs who is best positioned to argue in
19 opposition to Defendants’ Motion to Dismiss for Forum Non Conveniens, having
20 argued a substantively similar motion in a case pending in the Northern District of
21 Illinois, has a conflict with the current hearing date (Carey Decl. ¶¶ 4–7);

22 WHEREAS, counsel for Plaintiffs responsible for the oral argument has an
23 opening brief due to the Fourth Circuit Court of Appeals on Wednesday, January
24 29, 2025, the day prior to the scheduled hearing. As a result, counsel is unable to
25 travel to participate in the January 30, 2025 hearing as currently scheduled (Carey
26 Decl. ¶¶ 8–9);

1 WHEREAS, the Parties agree that it would conserve party and judicial
2 resources to hold the oral argument on Defendants' Motions and the scheduling
3 conference on the same day.

4 WHEREAS, all Parties have received notice of the Fenix Defendants' and
5 Plaintiffs' stipulation to move the hearing and have not objected to this stipulation;

6 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by
7 and between the Parties, through their undersigned counsel and subject to Court
8 approval, as follows:

9 1. The hearing on the Fenix Defendants' Motion to Dismiss for Forum
10 Non Conveniens (ECF No. 60) and Motion to Compel Plaintiffs to Proceed in Their
11 Real Names (ECF No. 61) is continued to February 6, 2025, at 10:00 a.m.; and

12 2. The Rule 26(f) Scheduling Conference will remain scheduled for
13 February 6, 2025, at 9:00 a.m., in Courtroom 10D.

14
15 DATED: January 13, 2025

16 HAGENS BERMAN SOBOL SHAPIRO LLP

17 By: Robert B. Carey

18 ROBERT B. CAREY

19 Attorneys for Plaintiffs

20 ***Pursuant to CIV. L.R. 5-4.3.4(a)(2)(i), all other***
21 ***signatories listed, and on whose behalf the filing is***
22 ***submitted, concur in the filing's content and have***
23 ***authorized the filing.***

24 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

25 By: Jason D. Russell

26 JASON D. RUSSELL

27 Attorneys for Specially Appearing Defendants
28 Fenix International Limited and Fenix Internet LLC